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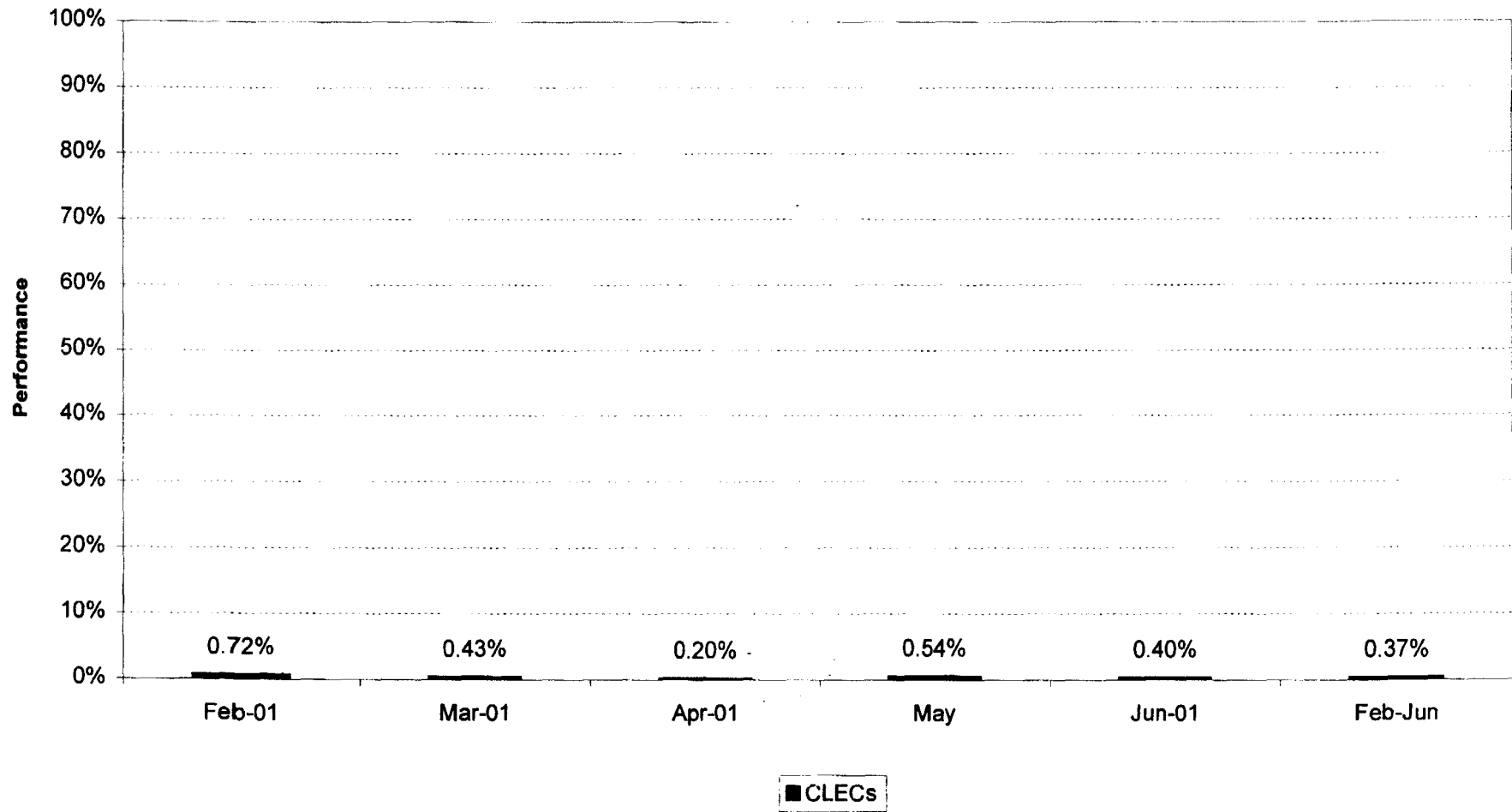
1

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 8

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania - UNE PROVISIONING
Provisioning - % Installation Troubles Reported within 7 Days - HOTCUTS
Feb - Jun 01



Pennsylvania - UNE Provisioning
Provisioning - % Installation Troubles Reported within 7 Days - Hotcuts
Feb - Jun 01

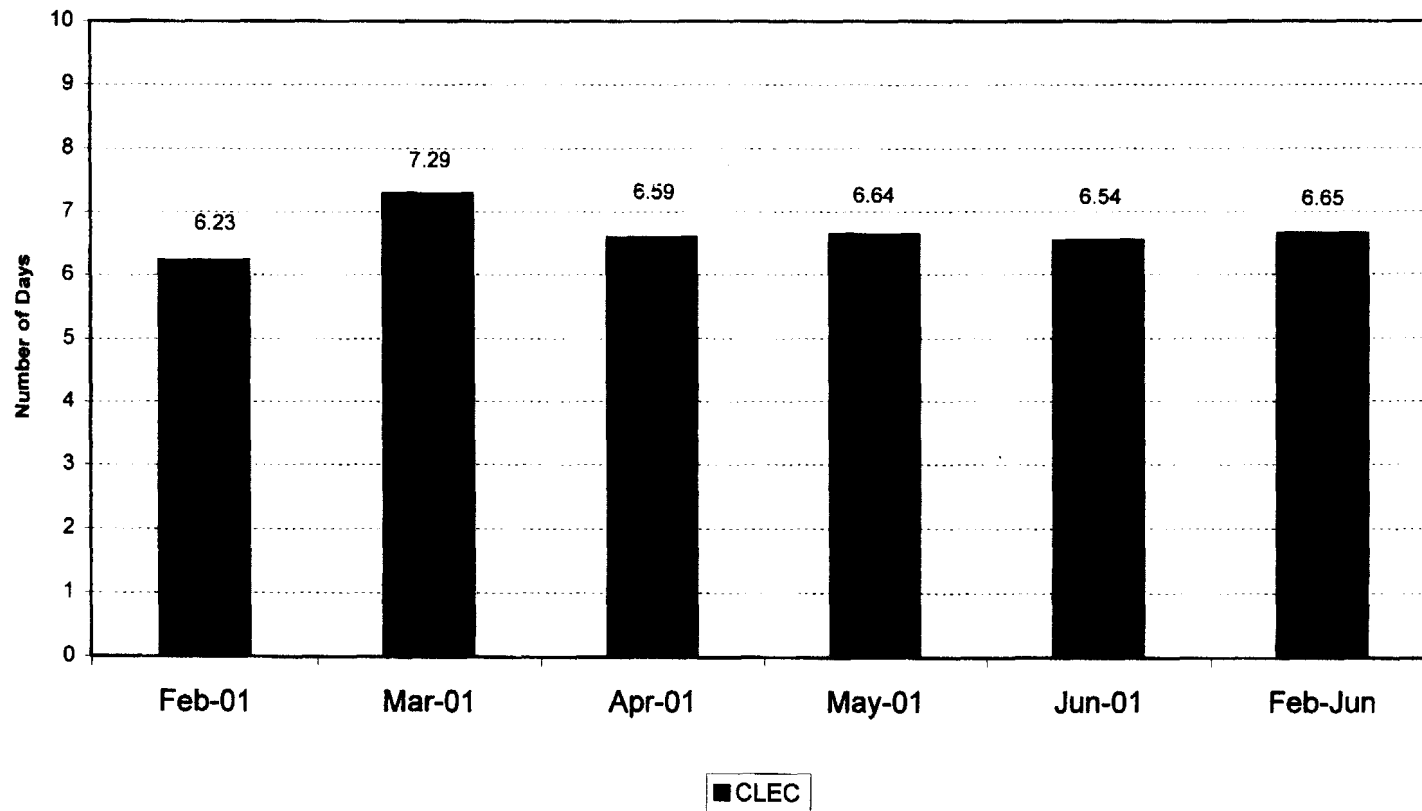
% Installation Troubles Reported within 7 days		<u>Feb-01</u>	<u>Mar-01</u>	<u>Apr-01</u>	<u>May</u>	<u>Jun-01</u>	<u>Feb-Jun</u>
CLEC							
Performance		0.72%	0.43%	0.20%	0.54%	0.40%	0.37%
Observations		4741	8202	19912	7597	6303	46755

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 9

Pennsylvania - UNE POTS
Provisioning - Average Completed Interval - Hot Cuts - (PR-2-01)
Feb - Jun 01



Pennsylvania - UNE POTS
Provisioning - Average Completed Interval - Hot Cuts - (PR-2-01)
Feb - Jun 01

PR-2-01

Feb-01

Mar-01

Apr-01

May-01

Jun-01

Feb-Jun

CLEC Aggregate
Performance
Observations

6.23	7.29	6.59	6.64	6.54	6.65
558	670	854	937	1324	4343

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 10

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania - UNE Special Services
Recalculation
Provisioning - Average Interval Completed - DS1 (PR-2-07)
May - Jun 01

PR-2-07May-01Jun-01Feb - Jun

CLEC

Performance

17.95

18.65

18.28

Observations

39

35

74

Adjusted Performance

16.28

14.8

15.60

Adjusted Observations > 13 and Fac. Misses

25

21

46

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHÖLZ**

ATTACHMENT 11

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania - UNE Special Services
Maintenance - Mean Time To Repair -Total (MR 4-01)
Feb - Jun 01

MR 4-01	<u>Feb-01</u>	<u>Mar-01*</u>	<u>Apr-01</u>	<u>May-01*</u>	<u>Jun-01</u>	<u>Feb - Jun</u>
VZ						
Performance	5.05	3.90	4.42	4.14	5.00	4.48
Observations	491	567	728	729	674	3189

CLEC						
Performance	2.23	11.48	5.10	8.25	6.56	6.61
Observations	7	7	7	5	17	43

March and May Recalculated

CLEC						
Performance	2.23	6.04	5.10	5.43	6.56	5.33
Observations	7	3	7	4	17	38

* March and May are recalculated.

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 12

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania - UNE Special Services
Recalculation
Provisioning - % Missed Appointments - Verizon - Total (PR-4-01)
Feb 01 ~Jun 01

PR-4-01

Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb- Jun

CLEC

Observations
 Reported Missed Appointments
 Adjusted Missed Appointments
 Reported Performance
 Recalculated Performance
 Inverse of Reported
 Inverse of Recalculated

58	82	68	173	156	537
23	24	24	55	52	178
8	9	8	26	13	64
39.66%	29.27%	35.29%	31.79%	33.33%	33.15%
13.79%	10.98%	11.76%	15.03%	8.33%	11.92%
60.34%	70.73%	64.71%	68.21%	66.67%	66.85%
86.21%	89.02%	88.24%	84.97%	91.67%	88.08%

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 13

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania - Special Services
Recalculation
Provisioning - % Missed Appointments - Verizon
Standard Interval (W Coded) Orders - Total (PR-4-09)
Feb 01 - Jun 01

PR-4-09Feb-01Mar-01Apr-01May-01Jun-01Feb-Jun

CLEC Aggregate						
Observations	29	52	36	50	51	218
Reported Missed Appointments	8	19	12	11	11	61
Adjusted Missed Appointments	2	4	4	5	3	18
Reported Performance	27.59%	36.54%	33.33%	22.00%	21.57%	27.98%
Recalculated Performance	6.90%	7.69%	11.11%	10.00%	5.88%	8.26%
Inverse of Reported	72.41%	63.46%	66.67%	78.00%	78.43%	72.02%
Inverse of Recalculated	93.10%	92.31%	88.89%	90.00%	94.12%	91.74%

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 14

July 24, 2001

DS1 and DS3 Unbundled Network Elements Policy

A number of carriers have recently expressed concern that Verizon is changing its policies with respect to the construction of new DS1 and DS3 Unbundled Network Elements. This is not the case. To ensure that there is no misunderstanding on this point this letter restates Verizon's policies and practices with respect to the provisioning of unbundled DS1 and DS3 network elements.

In compliance with its obligations under applicable law, Verizon will provide unbundled DS1 and DS3 facilities (loops or IOF) to requesting CLECs where existing facilities are currently available. Conversely, Verizon is not obligated to construct new Unbundled Network Elements where such network facilities have not already been deployed for Verizon's use in providing service to its wholesale and retail customers. This policy, which is entirely consistent with Verizon's obligations under applicable law, is clearly stated in Verizon's relevant state tariffs and the CLEC Handbook, and is reflected in the language of Verizon's various interconnection agreements.

This does not mean that CLECs have no other options for obtaining requested facilities from Verizon.

In areas where Verizon has construction underway to meet anticipated future demand, Verizon's field engineers will provide a due date on CLEC orders for unbundled DS1 and DS3 network elements based on the estimated completion date of that pending job, even though no facilities are immediately available. Rigid adherence to existing policies could dictate that the field engineers reject these orders due to the lack of available facilities; but in an effort to provide a superior level of service, Verizon has chosen not to do so. In such cases, the result is that the order is filled, but the provisioning interval is longer than normal. At the same time, Verizon's wholesale customers should not confuse these discretionary efforts to provide a superior level of service with a perceived obligation to construct new facilities.

Moreover, although Verizon has no legal obligation to add DS1/DS3 electronics to available wire or fiber facilities to fill a CLEC order for an unbundled DS1/DS3 network element, Verizon's practice is to fill CLEC orders for unbundled DS1/DS3 network elements as long as the central office common equipment and equipment at end user's location necessary to create a DS1/DS3 facility can be accessed. However, Verizon will reject an order for an unbundled DS1/DS3 network element where (i) it does not have the common equipment in the central office, at the end user's location, or outside plant facility needed to provide a DS1/DS3 network element, or (ii) there is no available wire or fiber facility between the central office and the end user.

Specifically, when Verizon receives an order for an unbundled DS1/DS3 network element, Verizon's Engineering or facility assignment personnel will check to see if existing common equipment in the central office and at the end user's location has spare ports or slots. If there is capacity on this common equipment, operations personnel will perform the cross connection work between the common equipment and the wire or fiber facility running to the end user and install the appropriate DS1/DS3 cards in the existing multiplexers. They will also correct conditions on an existing copper facility that could impact transmission characteristics. Although they will place a doubler into an existing apparatus case, they will not attach new apparatus cases to copper plant in order to condition the line for DS1 service. At the end user's end of the wire or fiber facility, Verizon will terminate the DS1/DS3 loop in the appropriate Network Interface Device (Smart Jack or Digital Cross Connect (DSX) Panel).

In addition, if Verizon responds to a CLEC request for an unbundled DS1/DS3 network element with a Firm Order Completion date (FOC), indicating that Verizon has spare facilities to complete the service request, and if Verizon subsequently finds that the proposed spare facilities are defective, Verizon will perform the work necessary to clear the defect. In the event that the defect cannot be corrected, resulting in no spare facilities, or if Verizon has indicated that there are spare facilities and Verizon subsequently finds that there are no spare facilities, Verizon will not build new facilities to complete the service request.

Finally, wholesale customers of Verizon, like its retail customers, may request Verizon to provide DS1 and DS3 services pursuant to the applicable state or federal tariffs. While these tariffs also state that Verizon is not obligated to provide service where facilities are not available, Verizon generally will undertake to construct the facilities required to provide service at tariffed rates (including any applicable special construction rates) if the required work is consistent with Verizon's current design practices and construction program. Even in these cases, of course, Verizon must retain the right to manage its construction program on a dynamic basis as necessary to meet both its service obligations and its obligation to manage the business in a fiscally prudent manner.

In summary, although Verizon's policies regarding the construction of new DS1 and DS3 Unbundled Network Elements remain unchanged, Verizon continues to strive to meet the requirements of its wholesale customers for unbundled DS1 and DS3 facilities in a manner that is consistent with the sound management of its business.

If you have any questions regarding Verizon's unbundled DS1/DS3 building practice, you may contact your Account Manager.